

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SAMUEL HOY BLACK and BERNARD BLACK,

Plaintiffs,

**DECLARATION OF  
ROBERT FANTONE, ESQ.**

-against-

CHERIE WRIGLEY, ESAUN G. PINTO, SR., and  
CPI INVESTIGATIONS INC.

Defendants.

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ROBERT FANTONE, an attorney duly admitted to practice in the Courts of New York,  
declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements  
are true:

1. I am an attorney of record for the Defendants Cherie Wrigley, Esaun Pinto, and CPI Investigations, Inc. (“CPI”), and as such I am fully familiar with the facts and circumstances stated herein.
2. I submit this declaration in support of Defendants’ joint motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.
3. Annexed hereto as Exhibit “A” is a true and accurate copy of a memorandum from Black to Linda Babcock, dated September 22, 2014.
4. Annexed hereto as Exhibit “B” is a true and accurate copy of an email from Pinto to Black, dated April 9, 2013.
5. Annexed hereto as Exhibit “C” is a true and accurate copy of an email from Wrigley to Black, dated April 10, 2013.

6. Annexed hereto as Exhibit “D” is a true and accurate copies of the invoices from CPI, dated April 2013 to September 2014.
7. Annexed hereto as Exhibit “E” is a true and accurate copy of an email from Pinto to Wrigley regarding expenses, dated April 16, 2013.
8. Annexed hereto as Exhibit “F” is a true and accurate copy of an email from Wrigley to Black regarding Joanne’s progress, dated April 25, 2013.
9. Annexed hereto as Exhibit “G” is a true and accurate copy of emails between Pinto and Black regarding Joanne’s progress, dated April 25, 2013.
10. Annexed hereto as Exhibit “H” is a true and accurate copy of emails between Pinto and Black regarding costs, dated May 14-16, 2013.
11. Annexed hereto as Exhibit “I” is a true and accurate copy of a emails between Pinto and Black regarding costs, dated May 26 to June 3, 2013.
12. Annexed hereto as Exhibit “J” is a true and accurate copy of a “Services List” created by Black and attached to an email to Pinto, dated June 3, 2013.
13. Annexed hereto as Exhibit “K” is a true and accurate copy of email from Black to Pinto regarding billing agreements, dated July 13, 2013.
14. Annexed hereto as Exhibit “L” is a true and accurate copy of an email from Black to Pinto regarding Pinto’s reduction in visits to Joanne, dated November 17, 2013.
15. Annexed hereto as Exhibit “M” is a true and accurate copy of an email from Pinto to Black regarding Pinto’s reduction in visits to Joanne, dated February 19, 2014.
16. Annexed hereto as Exhibit “N” is a true and accurate copy of emails between Pinto and Black regarding Black’s meeting with Joanne, dated September 4, 2014.

17. Annexed hereto as Exhibit “O” is a true and accurate copy of emails between Pinto and Black regarding Pinto’s payment for September and October 2014, dated September 2, 2014.
18. Annexed hereto as Exhibit “P” is a true and accurate copy of emails between Pinto and Black regarding Pinto’s termination and settlement of the account, dated September 30, 2014.

Dated: New York, New York  
December 7, 2020

**MANCILLA & FANTONE, LLP**

By:           /s/ Robert Fantone            
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